

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	DA 12-523
Emergency Communication by Amateur)	GN Docket No. 12-91
Radio and Impediments to Amateur Radio)	P.L. 112-96
Communications)	

To the Commission:

COMMENTS OF JAMES EDWIN WHEDBEE

Comes now JAMES EDWIN WHEDBEE (Commenter), who pursuant to P.L. 112-96 and Subpart H of Part 1 of the Commission's Rules and Regulations (47 CFR Section 1.200, et seq.), submits the following comments in response to the Commission's solicitation in these proceedings.

INTRODUCTION

[1] Commenter was licensed October 23, 1981 for amateur radio station KA0MLG, and is currently licensed through the year 2021 for amateur radio station N0ECN. This Commenter's academic credentials include an accredited Master of Public Affairs Degree in Disaster and Emergency Management (Exhibit A) from Park University, where Commenter is also currently employed as an Adjunct Professor. Commenter is also a lifetime certified teacher in the Kansas City, MO School District; a Commissioner of Deeds for the State of New Hampshire to the State of Missouri; and a multijurisdictional Notary Public. This Commenter is an advanced weather spotter registered with NOAA/National Weather Service (Exhibit B). This Commenter is a professional member of the International Association of Emergency Managers (IAEM - Region VII); a regular professional member of the Society of Broadcast Engineers (SBE #26971); a

regular member of the American Radio Relay League (ARRL); and, Clay County, MO Amateur Radio Emergency Service (ARES). Commenter's professional experiences include honorable active combat duty with the United States Army Signal Corps; service during the 9-11 Attacks and Hurricane Katrina as part of the U.S. Coast Guard; ownership and management of KZJW-LD; and as a member of the Safety Committee at Longfellow Elementary School in the Kansas City, MO School District. Commenter is a founding member of the United States Department of Homeland Security and holds numerous FEMA credentials in disaster and emergency management.

[2] Commenter's disaster management training particularly includes: risk assessment and management; disaster mitigation, preparedness, response, and recovery techniques; command and control; field personnel management and training; and, international, national, regional, and local disaster policy development and implementation. Commenter's telecommunications training particularly includes: operation and technique; telecommand; space operations; new operator training and management; link establishment and management; military and emergency field techniques and improvisation; and, policy development and implementation .

[3] Given this background, this Commenter has standing in these proceedings.

PART 1 - THE IMPORTANCE OF EMERGENCY AMATEUR RADIO SERVICE COMMUNICATIONS

[4] What are examples of disasters, severe weather, and other threats to life and property in which the Amateur Radio Service provided communications services that were important to emergency response or disaster relief? Provide examples of the

important benefits of these services.

COMMENTS RESPONSE: Emergency amateur radio service communications routinely provide weather spotter coverage in severe weather situations, including but not limited to: blizzards (Buffalo, NY 1977; Utah and Central Plains 2010), ice storms (New England 2008; North and South Carolina 1998), high winds (Ohio and Kentucky 2012), severe thunderstorms (nearly daily throughout April to June each year), tornadoes (Kansas and Missouri 2003, and numerous other incidents), floods (Midwest Floods of 1993; North Dakota 2011), and hurricanes (Hurricane Irene; Hurricane Katrina 2005). Radio amateurs are not limited to spotter duties, but actively support our National Weather Service during such severe weather events (Dura 2008). In disasters, the amateur radio and amateur satellite services are often THE disaster communications services, and particularly in the aftermath of earthquakes (Haiti) or severe weather disasters where infrastructures are destroyed (Katrina), power outages cannot be remediated, or governmental services are incapacitated.

The important benefits of these services include, but are not limited to...

- * EXPERIENCE: radio amateurs have always been the de facto emergency radio service, and when experience matters, the amateur radio and amateur satellite services will be the emergency radio services of choice to any well-trained disaster manager;

- * ZERO COST: radio amateurs cost nothing, thereby elimination of taxpayer expenses toward telecommunications infrastructure, personnel, training, and overhead -

disaster managers with an amateur radio operator deployed alongside is ensured maximum connectivity with minimum expense or liability;

* GENUINE EXPERTISE: radio amateurs have genuine FCC-tested technical and operational expertise in the communications modes, antenna deployment, and equipment choices for any emergency, disaster, or catastrophe - no other public radio service demands maintenance of knowledge within the state of the art, nor does any other public radio service so well enforce this principle through self-regulation and guidance;

* INTEROPERABILITY: radio amateurs are the most effective and efficient means to bridge civilian radio services, including the amateur/amateur satellite services and other governmental telecommunications services, because the amateur radio service is the principal developer of the analog and digital techniques involved in bridging such services, beginning with telephone autopatches in the analog age of communications all the way to WINLINK in the digital era;

* SPEED OF SERVICE: radio amateurs have second-to-none time on target responsiveness...amateur radio operators can be anywhere at any time with little or no delay, permitting immediate remediation and relief of telecommunications issues in the aftermath of an emergency, disaster, or catastrophe;

* TRUST: radio amateurs are ordinary people rather than government personnel-in a disaster, 'one of us' being there for a community comes with inherent trust and respect and ensures that disaster managers using radio amateurs have a better

mesh with ordinary citizens in impacted areas and abroad; and,

* RELIABILITY: radio amateurs use a simple common operational dialogue and technique amongst all radio amateurs allowing for certainty in the passage of emergency communications traffic which others have attempted to duplicate with limited or no success.

[5] b. Under what circumstances does the Amateur Radio Service provide advantages over other communications systems in supporting emergency response or disaster relief activities? Under what circumstances does the Amateur Radio Service complement other forms of communications systems for emergency response or disaster relief?

COMMENTER RESPONSE: First and foremost...the amateur radio service won't say "no..." and the amateur radio service carries within it the expectation that somewhere, someday, it shall be needed to deliver quick, reliable, and friendly service in an emergency or disaster. Amateur radio operators are members of their community engaged in their service without thought to cost or personal sacrifice...no other radio service claims this and none other has the history to back it up. The amateur radio service provides advantages over other communications systems in their ubiquitous nature: an amateur radio operator with useful equipment is nearby for almost every community in this nation. Likewise, amateur radio is unrestrained in the modalities of communications which may be used to provide connectivity where other radio services are constrained by their licenses to specific modes, powers, or techniques. Finally, amateur radio is not limited to using equipment for which prior equipment authorization

has been granted - an operator is free to improvise in the establishment and maintenance of communications links whereas in other radio services, either the technical expertise is lacking or the equipment cannot be improvised. These combine to give the amateur radio and amateur satellite services unparalleled adaptability and flexibility to meet the demands of any particular situation.

In spite of continuing demands for our spectrum by 'competing' radio services, the amateur radio service is, twenty-four hours per day and seven days per week, complementing all other forms of communications systems for emergency response or disaster relief-if for no other reason than the operators of those other services so often being radio amateurs too! If the amateur radio service cannot do it, to be candid, it cannot be done. The amateur radio service - through MARS for the military or through other organizations for civilian services - is continually on 'stand-by' for the day it is called into the service of any community regardless of circumstance and regardless of which radio service might otherwise be preferred. While no reminder is necessary to most individual radio amateurs that a day may come in which such service may be necessary, every license issued by the FCC to every radio amateur comes with the express condition that the station may be required someday under the President's War Powers.

[6] c. What Federal Government plans, policies, and training programs involving emergency response and disaster relief currently include use of the Amateur Radio Service? What additional plans, policies, and training programs would benefit from the inclusion of Amateur Radio Service operations? How would Amateur Radio Service operations fit into these plans and programs?

COMMENTER RESPONSE: The United States Department of Homeland Security (DHS) promulgated a document, entitled: "National Interoperability Field Operations Guide Version 1.4," (NIFOG) dated January 2011, wherein the Amateur Radio Service is referenced on Page 29, and the American Radio Relay League (ARRL) - the principle organization representing the Amateur Radio Service - is referenced on Page 55. FEMA Administrator Craig Fugate on May 3, 2011 stated, among other things, about the Amateur Radio Service: "...when you need Amateur Radio, you really need them." The DHS Citizen Corps references Amateur Radio. The Department of Defense for decades has employed the Amateur Radio Service through its Military Auxiliary Radio System (MARS). Simply put, the Amateur Radio Service is already featured in many domestic civilian agencies as an adjunct to their existing telecommunications services, and has a long-standing history supporting the military in domestic and foreign operations.

Additional plans, policies, and training programs including Amateur Radio Service operations should consider the following.

* PAST ATTEMPTS AT INTEROPERABILITY: Telecommunications services are unique, as are law enforcement, fire and rescue, and ambulance services. Each of these services has its own jargon, culture, and ideas about what is tactical or strategic. This has resulted in past attempts at interoperability failing, and to date, interoperability is seriously questionable. The amateur radio service is already comprised of military personnel, first responders, intelligence personnel, and disaster managers (amongst others), and therefore, is uniquely positioned to provide the lynchpin of interoperability, particularly when all else fails.

* MANDATED INCLUSION: With the Commission's Order in WP Docket 10-72, there is no logical, factual, or legal reason for avoiding a federal mandate that amateur radio be included in all federal disaster mitigation, preparedness, recovery, and response policies. Amateur radio shouldn't just be an adjunct to emergency communications through 'official channels,' it should be one of the 'official channels.'

* JARGON AVOIDANCE: Emergency communications MUST be plain language to avoid misunderstandings which, during any emergency, could prove fatal.

Amateur Radio Service operations fit into these plans and programs already because of existing connections between the amateur radio service and disaster and emergency management. However, rather than being a 'reserve' service, given the cost-benefit ratio (that being no cost and complete benefit), amateur radio should be part of the main response and continuum of emergency communications services.

[7] d. What State, tribal, and local government plans, policies, and training programs involving emergency response and disaster relief currently include use of the Amateur Radio Service? What additional plans and programs would benefit from the inclusion of Amateur Radio Service operations? How would Amateur Radio Service operations fit into these plans and programs?

COMMENTER RESPONSE: Here in the State of Missouri, the Office of Homeland Security for Missouri features the amateur radio service as one of its primary vehicles to communicate in an emergency. A great deal of the 2011 interoperability conference focused on the ability of amateur radio to accomodate most emergency communications

needs. (<http://www.dps.mo.gov/dir/programs/ohs/intercomm/feb9/amateur%20radio%20and%20nle-j.d.%20simmons.pdf>) The Missouri State Emergency Management Agency (SEMA) has policies directing state and local reliance on the amateur radio service to provide interoperable communications services. (http://search.mo.gov/search?q=amateur+radio&x=0&y=0&site=dps&output=xml_no_dtd&client=dps&num=10&proxystylesheet=dps) In the Kansas City, Missouri Metropolitan Area, disaster preparedness in this multijurisdictional area is handled in large part by the Mid-America Regional Counsel (MARC), which strongly advocates for inclusion of amateur radio services for disaster communications. (http://www.preparemetrokc.org/get_involved/amateurradio.asp) Additional plans and programs benefitting from inclusion of amateur radio service operations would be all states, tribes, and local jurisdictions. Aside from that, this commenter recommends the same for states, tribes, and local jurisdictions as he did with the federal community.

[8] e. What changes to the Commission's emergency communications rules for the Amateur Radio Service (Part 97, Subpart E) would enhance the ability of amateur operators to support emergency and disaster response? In addition, are there any specific changes that could be made to the technical and operational rules for the Amateur Radio Service (Part 97, Subparts B, C, and D) that would enhance the ability of amateur operators to support emergency and disaster response? What other steps could be taken to enhance the voluntary deployment and effectiveness of Amateur Radio Service operators during disasters and emergencies?

COMMENTS RESPONSE: The Commission's rules and regulations at Part 97, Subpart E should be changed to include a provision requiring no less than ten (10)

questions on each Amateur Radio Service examination in emergency communications fundamentals - with increasing depth of knowledge being required as prospective examinees progress through higher operator classes, and establishing the bank of questions which comprise the examination pool of questions for emergency communications. The technical and operational rules should be amended to correspond with the previous recommendation; however, the remainder of the rules are adequate. Other steps which could be taken to enhance the voluntary deployment and effectiveness of Amateur Radio Service operators during disasters and emergencies are as follows.

- * PROTECT SPECTRUM: Amateur radio spectrum should be protected against encroachment to ensure operators do not experience interference during the pendency of an emergency.

- * PHOTOGRAPH CREDENTIALING: Amateur radio licenses (as well as all others issued by the Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureau) should be issued in credit card format with basic licensee data on the face together with a photograph of the licensee (unless an organization), and the details of the license being stored in the magnetic stripe on the reverse. If an amateur radio licensee gets another license from the Wireless Telecommunications Bureau or Public Safety and Homeland Security Bureau, that license can be added to the credit card license; concurrently, if a non-amateur licensee obtains an amateur radio license, that can be added to their existing license. This would save the Commission significant funds in printing and administrative expenses and provide a credible credential for disaster management and related agencies to accept in connection with volunteer

services of amateur radio operators.

* REQUIRED EMERGENCY COMMUNICATIONS TRAINING: As part of the ten extra questions for the initial Technician License and the additional ten questions for each higher class operator license examination, basic emergency communications training should be mandated. This ensures that every amateur radio operator is aware of, and has been tested in, fundamental emergency communications.

[9] f. What training from government or other sources is available for Amateur Radio Service operators for emergency and disaster relief communications? How could this training be enhanced? Should national training standards be developed for emergency communications response?

COMMENTER RESPONSE: The ARRL offers training in emergency communications, and components of courses offered through the Emergency Management Institute (FEMA) also concern emergency communications techniques and methods. The training can be enhanced by mutual accreditation and scheduling of courses by ARRL and FEMA. Undoubtedly, the Commission could offer a role by serving as a course clearinghouse so that anybody with a FRN could register, take, and complete emergency communications courses. Furthermore, this would serve the dual purpose of creating a national registry of trained emergency communicators, regardless of radio service. Inasmuch as this commenter previously advocated changing the amateur radio service examinations and question pools to include ten questions of increasing depth of knowledge in emergency communications, these responses could be deemed as advocating national training standards. These licensing questions would serve as a

baseline for the further training through joint ARRL-FEMA courses administered through the FCC-clearinghouse and operator registry.

[10] g. What communications capabilities, e.g., voice, video, or data, are available from Amateur Radio Service operators during emergencies and disasters? Are there any future technical innovations that might further improve the Amateur Radio Service?

COMMENTER RESPONSE: All available (voice, video, data, and other) unencrypted emission modes and capabilities are available from the Amateur Radio Service during emergencies and disasters. There are technical innovations which will further improve the Amateur Radio Service, including but not limited to the digitization of visual emission modes via HF for long-distance ionospheric propagation, antenna miniaturization, and enhanced weak-signal modes capable of penetrating deliberate interference, poor ionospheric conditions, or weather phenomena. The amateur radio service is perfectly capable of safely and securely transmitting encrypted, even national security classified material, but current regulations prohibit such emissions.

[11] h. Are national standards in data transmission needed to enhance the ability of Amateur Radio Service operators to respond to emergencies and disasters? Are there restrictions with regard to transmission speeds that, if removed, would increase the ability of operators to support emergency/disaster response? If so, what issues could arise from removing these restrictions?

COMMENTER RESPONSE: It depends on how national standards are implemented whether those would enhance or inhibit Amateur Radio Service operations. If the

national standards require all federal, state, and local jurisdictions to match emission modes and bandwidths to those currently in use by radio amateurs, then such standards are definitely enhancements and would keep pace with the developments in the state of the art; however, if the reverse was the case (amateur radio being forced to conform to national standards based on other radio services' existing modes of transmission), the national standards would stifle innovations and slacken the pace at which radio amateurs developed within the state of the art. There are restrictions which, if removed, would increase the ability of amateur radio operators to support emergency/disaster response, and in particular, those are...

- 0.1357 to 0.479 MHz – 45 Baud.
- 0.479 to 5 MHz – 300 Baud.
- 5 to 29 MHz – The limitation of 300 Baud is too restrictive. That should be increased to at least 1,200 Baud, and any speed transmission should be permitted which is constrained within the bandwidth of a consumer grade double side-banded (AM) emission bandwidth of 6 kHz. Regarding bandwidths, there is little significant difference between 300 and 1,200 Baud emissions anywhere in the HF Spectrum; accordingly, the limitations which stand today are a hindrance.
- 29 to 148 MHz – The current limitations should be increased to 33,600 Baud, provided the signal's bandwidths are contained entirely within the band. In the case of these frequencies, again, the speed limitation should be removed entirely for signals which constrain their bandwidth to 16 kHz (consumer grade narrow-banded FM voice signal bandwidth).

- 219 to 928 MHz – The current limitations – if any – should be increased to 112 Kilobaud.
- >928 MHz – No limitation on emission speeds provided the bandwidth of the signal is maintained entirely within the amateur radio bands.

There are issues which, if the speed restrictions are upwardly adjusted, would arise but predominantly, those regard the signal bandwidths which would increase. The amateur bands can be adjusted to accommodate the higher emission speeds and bandwidths with little deleterious impact on routine operations.

[12] i. Would it enhance emergency response and disaster relief activities if Amateur Radio Service operators were able to interconnect with public safety land mobile radio systems or hospital and health care communications systems? What could be done to enable or enhance such interconnections? What issues could arise from permitting such interconnections?

COMMENTER RESPONSE: Yes, it would enhance emergency response and disaster relief activities if Amateur Radio Service operators were able to interconnect with public safety land mobile radio systems or hospital and health care communications systems. Regulatory changes are required to permit such interconnections; however, the equipment is already commercially available to make such interconnected service a practical reality. Such connections raise issues of patient privacy; however, existing communications laws already prohibit divulging communications to persons other than parties to the transmissions.

[13] j. Should there be national certification programs to standardize amateur radio emergency communications training, mobilization, and operations? How would such programs improve emergency communications?

COMMENTS RESPONSE: Please see the responses to question “e” in Paragraph 8 hereinabove. That entire response is incorporated herein by reference as if fully set out hereinbelow.

PART 2 – IMPEDIMENTS TO ENHANCED AMATEUR RADIO SERVICE COMMUNICATIONS

[14] a. What private land use restrictions on residential antenna installations have amateur radio operators encountered? What information is available regarding the prevalence of such restrictions? What are the effects of unreasonable and unnecessary restrictions on the amateur radio community's ability to use the Amateur Radio Service? Specifically, do these restrictions affect the amateur radio community's ability to respond to disasters, severe weather, and other threats to lives and property in the United States? What actions can be taken to minimize the effects of these restrictions?

COMMENTS RESPONSE: This commenter's deed is encumbered with such restrictions (Brooktree Homes Association, Gladstone, Missouri). Such restrictions are widespread in suburban communities concerned with the impact of tower erection on property values. The effects of unreasonable and unnecessary restrictions on the amateur radio community's ability to use the amateur radio service are that operations require higher than usual power levels to accomplish communications, increasing the

financial burdens on the radio amateur; even with higher power levels, with small antennas, preamplification of received signals is required to obtain the same level of reception as a towered installation; and, finally, the takeoff angle of transmissions via the ionosphere is poor for installations in communities which restrict towers and antennas. Yes, these restrictions negatively affect the amateur radio community's capacity to respond effectively in disasters, severe weather, and other threats to lives and property. These restrictions, if unreasonable and/or unnecessary, should be declared contrary to public policy in order to minimize the effects of these restrictions, thereby limiting their enforceability.

[15] b. What criteria distinguish “unreasonable or unnecessary” private land use restrictions from reasonable and necessary restrictions? How do local circumstances, such as neighborhood density or historic significance, affect whether a private land use restriction is reasonable or necessary? How does the availability of alternative transmitting locations or power sources affect the reasonableness of a particular private land use restriction?

COMMENTER RESPONSE: An unreasonable restriction is one which significantly impairs fixed station use of licensed amateur radio service facilities. An unnecessary restriction on amateur radio service activities is one solely premised in financial and aesthetic concerns with little or no basis in safety of the installation. Factors such as historic significance of an amateur radio site are already addressed by the Commission's programmatic environmental impact regulations; accordingly, that matter can be preempted by the Commission with little concern. Factors such as neighborhood density have a bearing on whether a restriction is necessary; however, by the same standard,

the benefit of emergency communications service via the amateur radio service to that community is correspondingly greater too; accordingly, these are offsetting. The availability of alternative transmitting locations or power sources should not be a factor in considering the reasonableness of a particular private land use restriction if the land use restriction results in degradation of an amateur radio operator's ability to use his or her own property as a fixed station.

[16] c. What steps can amateur radio operators take to minimize the risk that an antenna installation will encounter unreasonable or unnecessary private land use restrictions? For example, what obstacles exist to using a transmitter at a location not subject to such restrictions, or placing an antenna on a structure used by commercial mobile radio service providers or government entities?

COMMENTER RESPONSE: Currently the only way, for all practical intents and purposes, radio amateurs have to minimize the risk an antenna installation will encounter unreasonable or unnecessary private land use restrictions is by choosing whether to live in a neighborhood with restrictions or not. Alternatively, one can 'settle' for using mobile/portable antenna installations which are 'out of sight and out of mind.' The obstacles to using commercial installations or antenna installations of governmental entities is financial. When one lives in a neighborhood with restrictions, having a transmitter at a location not subject to such restrictions essentially requires permanently using one's station as a portable/mobile facility.

[17] d. Do any Commission rules create impediments to enhanced Amateur Radio Service communications? What are the effects of these rules on the amateur radio

community's ability to use the Amateur Radio Service? Do disaster and/or severe weather situations present any special circumstances wherein Commission rules may create impediments that would not otherwise exist in non-disaster situations? What actions can be taken to minimize the effects of these rules?

COMMENTER RESPONSE: Yes, some Commission rules create impediments to enhanced Amateur Radio Service communications, and with particularity, those are as follows.

- Section 1.3 (47 CFR Section 1.3) regarding waivers. Waivers are being granted far too often and allow far too limited FCC oversight of the waived activities, some of which encroach upon or interfere with the Amateur Radio Service. Certain of such waivers transgress amateur radio spectrum with the appearance of the Commission being a cheerleader rather than a regulator of the waived activity. Waivers should be very narrowly tailored (i.e., limited in application and scope to the party requesting it, limited to one or two rules at most, and not be perceivable as an existing radio service), should require a party be aggrieved by the rules subject to waiver (i.e., a party should prove that none of the waived communications are possible within existing services without grant of the waiver), and should further be restricted to parties who have exhausted all other administrative remedies, including rulemaking (i.e., a party applying for a waiver must demonstrate that it has eliminated all available avenues of obtaining relief prior to requesting the waiver). If a waiver applicant cannot meet these requirements, Section 1.3 of

the Commission's rules should be revised to require the Commission to reject the application.

- Section 2.106 (47 CFR Section 2.106) regarding the allocations available to the amateur radio, amateur satellite, and similarly situated emergency communications services. Amateur radio, amateur satellite, and similarly situated emergency communications services should be sequestered, by Footnote or within the regulation itself, from encroachments by other radio services.
- Parts 15 and 18 (47 CFR Parts 15 and 18) regarding unlicensed devices using amateur radio spectrum. Part 15 should be revised to prohibit the use of such devices anywhere within the spectrum allocations for amateur radio or amateur satellite services.
- Section 97.111 (47 CFR Section 97.111) regarding authorized transmissions. Amateur Radio and Amateur Satellite Service stations should be authorized to communicate with experimental radio stations occupying amateur radio spectrum and with public safety stations in the provision of emergency, disaster, or catastrophe communications.

Certainly, the revision of Section 97.111 to allow interservice communications is uniquely tailored to reflect current reality: the amateur radio service is not currently authorized to communicate with stations in the public safety services, despite the fact that such stations may essentially be colocated. This creates unnecessary duplications in equipment purchases and services which a simple rule revision can eliminate. The rule changes advocated above will essentially eliminate these problems. Likewise, amateur

radio operators are very likely to avoid frequencies upon which interference will happen either to the amateur service or by the amateur service – it creates a negative perception in the public just when their trust is most needed. Accordingly, adoption of the rule changes advocated regarding waivers, the table of allocations, and unlicensed emissions will eliminate those problems too.

[18] e. What other impediments to enhanced Amateur Radio Service communications have amateur radio operators encountered? What are the effects of these impediments on the amateur radio community's ability to use the Amateur Radio Service? Specifically, do these impediments affect the amateur radio community's ability to respond to disasters, severe weather, and other threats to lives and property in the United States? What actions can be taken to minimize the effect of these impediments?

COMMENTS RESPONSE: See the response in Paragraph 17 to question "d."

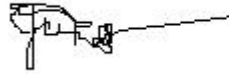
[19] f. The legislation requires the Commission to identify "impediments to enhanced Amateur Radio Service communications." What specific "enhance[ments]" to Amateur Radio Service communications have been obstructed by the impediments discussed above?

COMMENTS RESPONSE: Legislation may be necessary to accomplish the regulatory changes required in response to question 'd' as shown in Paragraph 17 hereinabove. The enhancements obstructed are likewise identified in that response.

WHEREFORE, the foregoing considered, the Commenter respectfully requests the Commission report and act upon the foregoing as described hereinabove.

April 6, 2012

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'James Whedbee', with a long horizontal line extending to the right.

JAMES EDWIN WHEDBEE, M.Ed., M.P.A.
5816 NE BUTTONWOOD TREE LANE
GLADSTONE, MISSOURI 64119-2236
816.694.5913
jamesewhedbee@yahoo.com
COMMENTER

Exhibit "A"

Park University

The Board of Trustees and the President,
upon recommendation of the Faculty,
hereby confers upon

James Edwin McHedbee

the degree of

Master of Public Affairs

Disaster & Emergency Management

with all the Rights, Honors, Privileges, and Responsibilities thereto appertaining
in recognition of the satisfactory fulfillment of the requirements of this Degree.

In Witness Whereof, we have hereto subscribed our names and have caused the seal of
the University to be affixed in accordance with the laws of the State of Missouri,
two thousand and eleven.

Michael H. Hoop
Michael H. Hoop, Ph.D.
President of the University



Parkville, Missouri

N. Gray Kline
N. Gray Kline
Chair, Board of Trustees

Exhibit "B"



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL WEATHER SERVICE
1803 North 7 Highway
Pleasant Hill, Missouri 64080

July 19, 2007

James Whedbee
5816 N Buttonwood Tree Lane
Gladstone, MO 64119

Dear James,

On behalf of the National Weather Service in Kansas City/Pleasant Hill, Missouri, I would like to extend my welcome to our Community Weather Involvement Project (CWIP). You attended severe weather spotter training in the spring of 2006 and expressed an interest in being a severe weather contact for the NWS, and a storm spotter for your community.

Your CWIP identification number is **CLA349**. You should use this identifier when contacting the NWS office in Pleasant Hill with severe weather reports. The identifier consists of your county name and a number, so when you call in you should identify your ID in that fashion (i.e., state your county "Clay" and then the trailing number in your identifier CLA349). If you live in Johnson, Linn or Atchison counties, you should simply spell out the letters in your CWIP ID, as your county names duplicate across state lines. **Special note: If you are not at home, please give your CWIP ID and then state you are "mobile", so we accurately plot the location of your report.**

When you do observe severe weather conditions in your area, I encourage you to notify both the NWS and your local law enforcement or emergency management agency. Our toll-free unlisted severe weather hotline is **(800)438-0596**. At times, staff from our office may also attempt to contact you after a storm has passed.

Please take a moment and review your address above, as well as the information we have on file below. If there are any changes or errors, please let me know via e-mail at **Andy.Bailey@noaa.gov**, or by phone at (800)438-0596. In January, the schedule for next year's spotter talks will be posted on our web site at **<http://weather.gov/kc>**, and will be played on NOAA Weather Radio. I encourage you to attend a spotter class at least every other year. When you do attend, please note your CWIP ID on the sign-in sheet, so we can accurately track your training record.

Best regards,

Andy Bailey
Warning Coordination Meteorologist
National Weather Service Kansas City/Pleasant Hill, MO

Phone Number: (816) 694-5912 Cell Phone:

Times to contact you:

Email address: jameswhedbee@yahoo.com